



Hal S. Shaftel
Tel 212.801.9200
Direct 212.801.2164
shaftelh@gtlaw.com

April 2, 2019

VIA ECF

The Honorable Vernon S. Broderick
United States District Court
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square, Room 415
New York, NY 10007
(212) 805-6165

Re: *Great Western Ins. Co. v. Mark Graham et. al.*,
Case No. 1:18-cv-06249 (VSB)

Dear Judge Broderick:

We are counsel to Ability Insurance Company, Advantage Capital Holding LLC, Dan Cathcart, and Kenneth King (the "Ability Defendants") in the above-captioned matter.

Per Rule 4.J. of Your Honor's Individual Rules & Practices in Civil Cases, the Ability Defendants respectfully request oral argument in connection with their Motion to Dismiss the Specific Claims Pleaded Against Ability Insurance Company, Advantage Capital Holding LLC, Dan Cathcart, and Kenneth King in Great Western Insurance Company's Second Amended Complaint, dated December 19, 2018, (Dkt. 106). We appreciate Your Honor's attention to these matters.

Respectfully submitted,

/s/ Hal S. Shaftel
Hal S. Shaftel

cc: All Counsel of Record

ALBANY
AMSTERDAM
ATLANTA
AUSTIN
BOCA RATON
BOSTON
CHICAGO
DALLAS
DELAWARE
DENVER
FORT LAUDERDALE
HOUSTON
LAS VEGAS
LONDON*
LOS ANGELES
MEXICO CITY*
MIAMI
MILAN*
NEW JERSEY
NEW YORK
NORTHERN VIRGINIA
ORANGE COUNTY
ORLANDO
PHILADELPHIA
PHOENIX
ROME*
SACRAMENTO
SAN FRANCISCO
SEOUL*
SHANGHAI
SILICON VALLEY
TALLAHASSEE
TAMPA
TEL AVIV*
TOKYO*
WARSAW*
WASHINGTON, D.C.
WESTCHESTER COUNTY
WEST PALM BEACH

*OPERATES AS
GREENBERG TRAURIG MAHER LLP

*OPERATES AS
GREENBERG TRAURIG, S.C.

*STRATEGIC ALLIANCE

*OPERATES AS
GREENBERG TRAURIG LLP
FOREIGN LEGAL CONSULTANT OFFICE

*A BRANCH OF
GREENBERG TRAURIG, P.A.,
FLORIDA, USA

*OPERATES AS GREENBERG
TRAURIG HORITSU JIMUSHO

*OPERATES AS GREENBERG
TRAURIG GRZESIAK SPK